

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CAMRON SNEED,	§	
<i>Plaintiff,</i>	§	
	§	
	§	
v.	§	C.A. NO.: 1:19-cv-608
	§	Jury Trial
AUSTIN INDEPENDENT	§	
SCHOOL DISTRICT,	§	
<i>Defendant.</i>	§	

PLAINTIFFS' WITNESS LIST

Plaintiff designates witnesses as follows:

I. LIKELY TO BE CALLED

- 1) Charles E. Sneed, Sr.
- 2) Pamela J. Parks
- 3) Camron Sneed
- 4) Austin Independent School District
*(Including but not limited to its board members, administrators, employees,
Corporate Representatives, agents and staff and all other custodians of billing
records):*

Corporate Representative with knowledge of:

*ISD policies and procedures
Hiring and vetting, training and supervision of employees
Protocols for protection of students in similar circumstances
Reporting requirements for ISD employees regarding suspected or alleged
bullying/bias/discrimination/harassment
Applicable standards for professional judgment
Investigation of these events
All board action resulting from these events
Performance reviews of employees
Title VI compliance
Authenticity of all information produced in discovery, including
Defendant's custodian of such records/information*

Dr. Craig Shapiro (former Associate Superintendent of High Schools - AISD)
Awaiting last known phone number from Defendant
2961 Sussex Garden Lane
Austin, Texas 78748
AISD has requested Plaintiff to contact this witness through them

Dr. Paul Cruz (former Superintendent AISD)
Awaiting last known address and phone number from Defendant
512.765.0588
AISD has requested Plaintiff to contact this witness through them

Yasmin Wagner trustee
If no longer on the board, Defendant will provide last known address and
phone number

James Bowie High School

Mark Robinson (principal)
Ryan Thomas Band Director (2016-2017)
Anthony Paxton Band teacher
Agriculture Teachers
Amber Dickinson
Shelby Stephens
Susan Leos (assistant principal)
Vincent Trevino (former assistant principal)

5) **Students:**

Brandon Parker
633 Blue Ridge Drive
Dripping Springs, Texas 78620
512.576.1676

Josh McCormick
6609 Quincy Cove
Austin, Texas 78739
512.394.9722

Ayden Strange
10610 Valley Vista Road
Austin, Texas 78737
512.785.0638

6) **Adults:**

Brad Pierce Former agriculture teacher at James Bowie High School
5304 Dry Wells Road
Austin, Texas 78749
512.736.6691
Bwpierce2011@gmail.com

Tiffany Black Former agriculture teacher at James Bowie High School
315 Thomas Oaks Drive
Wimberley, Texas 78676
512.431.3924
Tiffskyy8@yahoo.com

Nelson Linder
President NAACP
Austin, Texas
512.476.6730
lindernelson@aol.com

Stephanie Parker
633 Blue Ridge Drive
Dripping Springs, Texas 78620
512.576.1676

Samantha Strange
10610 Valley Vista Road
Austin, Texas 78737
512.785.0638

7) **Treaters:**

Bolutife "Bolu" Dosumu, LCSW, MPA
Glasshouse Effect Psychotherapy, PLLC
(including custodian of records and custodian of billing)
111 Ramble Lane, Ste 120
Austin, Texas 78745
817.789.9744

Tina Rix, MS, LMFT, CEO,

Better Path Family Counseling and Consulting, PLLC
(including custodian of records and custodian of billing)
2703 Sol Wilson Ave
Austin, Texas 78702
512.660.3499

- 8) Defendants' witness designations are incorporated fully by reference herein for the express purpose of cross-examination. Plaintiffs' do not vouch for the accuracy or credibility of such adverse witnesses, but reserve the right to elicit their testimony.

Plaintiffs may not call witnesses in the order listed, and reserve the right to cross-examine witnesses sponsored by, or called by, Defendant. Plaintiffs reserve the right to challenge the qualification of any witness to testify, and to challenge the methodology, expertise (if proffered) and reliability of such witnesses for lay or expert opinion.

II. POSSIBLE WITNESSES

Austin Independent School District

1. ***(Including but not limited to its board members, administrators, employees, Corporate Representatives, agents and staff and all other custodians of billing records):***

Dr. Jacob Reach	<i>Chief of Staff</i>
Rosa Palacios	<i>(Dr. Cruz's executive assistant)</i>
Edna Butts	<i>Director of Intergovernmental Relations</i>

James Bowie High School:

Stephanie McGraw	<i>(former assistant principal)</i>
Larry Britton	<i>(former assistant principal)</i>
Beverly Reeves	<i>former Administrative Supervisor of Customer Service</i>
Nona May	<i>former counselor</i>
Traci Hendrix	<i>ISD employee</i>
Claire Smith	<i>school counselor</i>

Campus Police / SRO department

Stephanie Kirkov
Angelica Covington
Steve Melton
Officer _____ Cheney

2. **Students:**

Joseph Duarte
Christian Byers
Will Gamblin
Kylee Rhorer
Kristin Ng
Matt or Michael
Lauren Aman (pit leader – band)
Jonathan Lugo (band)
Kaitlin Cinque
Michael Kennedy
Gina Grasso
Claire Skrobarczyk
Grace Burden
Jasmin Garza
Delal Abed
Sophia _____
Hailey _____
_____ Dogge
Hugo _____
Caden McCullough

referenced in Camron's deposition
referenced in Camron's deposition
referenced in Camron's deposition
referenced in Camron's deposition
referenced in Camron's deposition

3. Adults:

Mark Fischer 512.750.5002
Gary Adams
Samantha Strange
Kristen Benton
Rebecca Lusk
Kristin Benton
Stacey Jo Petrash
B.J. Guerra
Troy Wenzel

4. Habit, Practice, Custom / Prior Notice:

Mechele Dickerson *ISD parent with knowledge of other similar incidents/pattern of racial misconduct and nonfeasance*
University Distinguished Teaching Professor
Arthur L. Moller Chair in Bankruptcy Law

The University of Texas at Austin Law School
727 East Dean Keeton Street
Austin, Texas 78705
512.232.1311

Therese Menzia a/n/f Z. M.-D.
2011 East 6th St Apt #2204
Austin, Texas 78702
(737) 708-0839
francineb16@yahoo.fr

This family will speak to the fact their child was a victim of race based bullying, harassment and assaults but the School District's Title VI Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Kelly Land & Aaron Baldonado a/n/f for E.B.
2630 Nova Park Ct.
Rockwall, Texas 75087
512-573-9435
kland87@gmail.com [Email]

This family will speak to the fact their child was a victim of sexual assault at the AISD but the School District's Title IX Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Christina Villareal & Leonard Barba a/n/f J.B.
4507 Sarasota Drive
Austin, Texas 78749
atxgrl77@gmail.com [Email]

This family will speak to the fact their child was a victim of sexual assault at the AISD but the School District's Title IX Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Javier, Gabriela a/n/f C.C.
201 44th Street
Horseshoe Bay, Texas 78657
jjcastrotx@aol.com [Email]
smithcastro@aol.com [Email]

This family will speak to the fact their child was a victim of sexual assault at the AISD but the School District's Title IX Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Monica Gomez a/n/f M.T.
670 Louis Henna Blvd #901
Round Rock, Texas,
(737) 217-1447

monicagomez161@gmail.com [Email]

This family will speak to the fact their child, who has special needs, was assaulted by a school teacher and nevertheless the School District's Section 504 Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Josef & Jennifer Merrill a/n/f E.M.
2617 Bear Springs Trail
Austin, Texas 78748
(512) 817-9007

josefmerrill@gmail.com [Email]

This family will speak to the fact their child was a victim of bullying and harassment based upon sex and the School District's Title IX Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Chad & Angie Wagner a/n/f M.W.
4917 Calhoun Canyon Loop
Austin, Texas 78735
(512) 789-7998

anghwag@gmail.com [Email]

This family will speak to the fact their child, who has special needs, was assaulted by a school teacher and nevertheless the School District's Section 504 Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Latha Natarajan a/n/f P.R.
3139 Silkgrass Bend
Austin, TX 78748
(512) 962-3275

lathanata7608@gmail.com [Email]

This family will speak to the fact their child, who has special needs, was assaulted by a school teacher and nevertheless the School District's Section 504 Coordinator never became involved or investigated the assaults, as required by federal law, rules and local School Board Policies & Procedures.

Leah Kelly a/n/f H.L.K.

Austin, Texas

(512) 815-7730

leahkelly512@gmail.com [Email]

This family will speak to the fact their child, who has special needs, was bullied and harassed at school but nevertheless the School District's Section 504 Coordinator never became involved or investigated the bullying and harassment, as required by federal law, rules and local School Board Policies & Procedures.

Ciara Collins a/n/f M.C.

Austin, Texas

(512) 243-6936

cichco@gmail.com [Email]

This family will speak to the fact their child, who has special needs, was bullied and harassed at school but nevertheless the School District's Section 504 Coordinator never became involved or investigated the bullying and harassment, as required by federal law, rules and local School Board Policies & Procedures.

5. Treatment:

Manuel Martin, M.D.

South Austin Medical Clinic

(including custodian of records and custodian of billing)

2555 Western Trails Blvd #106

Austin, Texas 78745

6. Additional Rebuttal:

Plaintiff reserves the right to call undesignated, rebuttal witnesses, as allowed by law.

7. Attorneys (attorneys have agreed to submit attorney fee testimony via affidavit post verdict, if necessary):

- a. **Martin Cirkiel**
- b. **Anthony O'Hanlon**
- c. **Jonathan Brush**
- d. **Amy Demmler**

III. DESIGNATED DEPOSITION TESTIMONY

If needed, Plaintiff reserves the right to present the following deposition testimony.

1. **Dr. Paul Cruz** (June 26, 2020)

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2. **Dr. Craig Shapiro** (May 18, 2020)

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Respectfully submitted,

/s/ ANTHONY O'HANLON

Anthony O'Hanlon

Anthony O'Hanlon, P.C.

State Bar No. 15235520

Federal ID: 3122684

Attorney and Counselor at Law

Anthony O'Hanlon, P.C.

111 South Travis Street

Sherman, Texas 75090

(903) 892-9133 (telephone)

(903) 957-4302 (fax)

aohanlon@somlaw.net

ATTORNEY FOR PLAINTIFFS

Martin Cirkiel

CIRKIEL & ASSOCIATES, P.C.

State Bar No. 00783829

Fed. ID # 21488

1901 E. Palm Valley Blvd.

Round Rock, Texas 78664

(512) 244-6658 [Telephone]

(512) 244-6014 [Facsimile]

marty@cirkielaw.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2020, I hereby certify that a true and correct copy of the above and foregoing document has been electronically served on all counsel of record.

/s/ Anthony O'Hanlon

Anthony O'Hanlon